

## **TITLE V OPERATING PERMIT STATEMENT OF BASIS**

**Facility Name:** Solar Turbines Inc.

**Title V Application Number:** APCD2013-APP-002789

**Facility ID:** APCD1976-SITE-01130

**Equipment Address:** P.O. Box 85376 Mail Zone T-2  
San Diego, CA 92186

**Facility Contact:** Lori Haase  
**Contact Phone:** (858) 663-0894

**Permit Engineer:** Doug Erwin  
**Date Completed:** 6/20/13

### **1.0 Introduction / Purpose**

This statement of basis describes a minor modification to Solar Turbines Incorporated (Solar)'s Title V permit. The requested change pertains to the most recently installed of three identical thermal oxidizers -- this latest installation being proposed for addition to the Title V permit, with the subject change. The applicant requested deletion of the testing requirement in lieu of a previous representative source test that was performed on another of these three units on April 19, 2002 under PTO-976905. This is the only change being proposed for this modification.

The thermal oxidizers were installed to burn visible liquid droplets in the exhaust stream and reduce visible emissions from select test cells during liquid fuel testing.

### **2.0 Facility Description**

Solar manufactures and tests gas turbine engines at its Kearny Mesa facility. The latest of three thermal oxidizers was recently installed to reduce visible emissions which may result during combustion of distillate fuels at several of its test cells. The company also prepares metal component surfaces and applies coatings to those components at this facility.

For the emission unit being considered, an in-depth evaluation was conducted prior to issuance of the required District authority to construct (ATC). Related documentation is on file with the District and is available upon request.

### 3.0 Emissions Summary

Following is a summary of facility-wide emissions as report for emissions inventory purposes.

Emissions Summary (as reported for 2011)	
Criteria Pollutants	tons/yr
NO <sub>x</sub>	103
VOC	13
PM <sub>10</sub>	9.5
PM <sub>2.5</sub>	<0.1
SO <sub>2</sub>	6.0
CO	33
Total Federal HAPs	4.1

### 5.0 Applicable Requirements

For this permit action, no new rules or requirements are being added. Requirements that apply to the emission unit under review include provisions for District Rule 53 (specific air contaminant limitations including those from fuel combustion), Rule 62 (sulfur content of fuels) and Rules 20.1 and 20.2 which address new source review. All of these were written into the conditions at the time of issuance of the ATC, and appear the same in the conditions comprising this modification.

For this permit action, the requirements applicable to each of three emergency engines have been added to the body of the Title V permit. Most importantly, these comprise engine maintenance as required under 40 CFR 63 Subpart ZZZZ.

### 6.0 Monitoring, Record-keeping and Reporting

The District permit which is incorporated into the Title V permit at Appendix A contains substantial monitoring, record-keeping and reporting (MRR). The body of the Title V permit contains additional MRR pursuant to District Regulation XIV (Title V) to further strengthen the permit.

Compliance Assurance Monitoring (CAM) applicability was considered for this review pursuant to 40 CFR Part 64. The related thermal oxidizer does not fall within the applicability criteria of Part 64.2(a), and therefore is not subject to CAM.

### 7.0 Permit Shield

Pursuant to District Rule 1410(p) and 40 CFR § 70.6(f), a Title V permit may include a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the permit issuance date. The permit

shield is restricted for minor modifications, as given at Rule 1410(j)(1)(i), to requirements not related to the requested change. The existing permit shield, which was incorporated in a condition at the time of the ATC, cites rules that do not apply and therefore remain in the conditions of the emissions unit under consideration.

#### 8.0 Outside Review

In accordance with District Rule 1410, specifically addressing minor permit modifications under Title V, the District will provide notice to the Environmental Protection Agency Region 9.

#### 9.0 Conclusions / Recommendations

The source is expected to comply with all applicable requirements including those cited in the conditions for the thermal oxidizer under consideration in this review. Therefore, the recommendation of this report is for the subject minor modification to be issued following EPA review.